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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

KEVIN BRATCHER,

Plaintiff,

v.

POLK COUNTY, CITY OF SALEM, DEPUTY  
MICHAEL H. SMITH, in his individual  
capacity, and DOES 1-2, in their individual  
capacity,

Defendants.

Case No. 3:20-CV-02056-SB

**DECLARATION OF JENNIFER M.  
GADDIS IN SUPPORT OF CITY  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

I, Jennifer M. Gaddis, hereby declare under penalty of perjury that the following is true and correct:

1. I am the attorney representing the City Defendants in this matter. This Declaration is offered to present deposition transcript to the Court in support of City Defendants' Motion for Summary Judgment.

2. Attached to this Declaration and marked "Exhibit 1" are excerpts of the deposition testimony of plaintiff Kevin Bratcher, taken on behalf of City Defendants on September 30, 2021.

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**I hereby declare under penalty of perjury that the foregoing is true and correct.**

DATED: January 28, 2022.

*s/ Jennifer M. Gaddis*

Jennifer M. Gaddis, OSB 071194

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Attorney for City Defendants